## United States District Court Eastern District Of Virginia Richmond Division



RAYMOND TIEDE,	)	
Petitioner,	)	
<b>v.</b>	)	No.3:19cv589
	)	
	)	
JEFFREY CRAWFORD,	)	
Respondent.	)	
	)	
	)	

## motion to expedite,

Now, comes RAYMOND TIEDE (Mr. Tiede) pro se moves this court to expedite his case for the following reason.

Mr. Tiede is in great fear for his life at the Farmville detention center because he cannot practice the CDC guideline, it is impossible to practice social distancing and stay 6 feet away from each other they sleep literally right next to each other. That ICE facility "is plainly not equipped to protect him from potentially fatal exposure to COVID-19". It is impossible to know how rapidly the virus is spreading inside ICE detention Centers. In one case, a federal lawsuit forced the government to acknowledge that it had not tested any ICE detainees inside Howard County Detention Center in Jessup Maryland, does not have test kits at the facility and has "no plans to conduct testing," therefore at the Farmville Detention Center is the same occurrence because Mr.Raymond is detained there. ICE data on coronavirus cases is missing a large pool of

people: the thousands of private contractors who work as wardens, administrators, guards, doctors, nurses, janitors and cooks inside ICE detention Centers. Therefore it is impossible to know who will bring in the next case of the virus. ICE count for the virus is missing two nurses and one guard who died over the past week because of coronavirus complications at the Hudson County Correctional Center in Kearney, New Jersey. Today according CNN news in Ohio State, more than 1300 inmates and 103 staff members got tested positive of covid 19 in three different institutions: (Marion correctional Institution, Packaway correctional Institution, and Francklin medical center). Here in Farmville detention center one dorm (dorm 6) with almost 80 inmates is on quarantine for two weeks now, while all the dorms communicate via the air duct system (HVAC). Which means the same air circulates through all the dorms. Mr. Tiede is deeply concerned about his health and welfare at the Farmville Detention Center because he does not feel protected. On March 11, 2020 the World Health Organization declared the spread of the novel COVID-19 virus to be a global pandemic. As of March 22 at least 316,692 people worldwide have confirmed diagnosis, including over 27,004 people in the united states See Jhons Hopkins University & Medicine CORONAVIRUS COVID-19 Global cases,http://coronavirus.jhu.edu/map.html (last accessed Mar.22,2020) center for disease control CDC. Over 13,598 people have died as a result of COVID-19. The transmission of COVID-19 is expected to grow exponentially. This was last recorded back in March 22 2020. As of April 20th 2020 over 39,000 people have died in the United States (only).

Dr. Anne Spaulding, an expert on jail health systems, explains, "[i]ncarcerated persons sleep in close quarters, such as here at Farmville Detention Center she goes on by stating that detainees eat together recreate in small spaces, staff are close by. Both those incarcerated and those who watch over them are at risk for airborne infections. See Dr. Anne C. Spaulding Coronavirus COVID-19 and the CORRECTIONAL facility.

@https://www.ncchc.org/filebin/news/COVID\_for\_CF.\_HCW\_3.9.20.pdf; According to Dr.Homer Venters former Chief Medical Officer of New York City Jail System, "[i]t's just matter of time before we see cases [of coronavirus] inside detention centers and prisons. NBC news, coronavirus could 'wreak havoc' on U.S. jails experts warn ones COVID-19 IS INTRODUCED to a jail or detention center, these environments provide prime breeding ground for the spread of infectious diseases. Impossible for a detained person, to follow CDC recommendations to avoid crowds, especially in poorly ventilated spaces. At no time is he ever six feet away from another person. they are sitting ducks in a petri dish. Once it gets in there everybody is going to catch it."The risk of contracting COVID-19 in tightly confide spaces especially jails, detention centers, prisons is now exceedingly obvious ",wrote U.S. district Judge Analisa Torres in a ruling ordering the release of 10 ICE detainees from detention center in New Jersey last month.

For the foregoing reason Mr. Tiede ask that his case be expedited.

Date 04-19-20

sign kaynets rule

## Certificate of service

I certify that on <u>OU-19-20</u> I RAYMOND TIEDE send a copy of this brief to Jonathan T. Lucier Attorney for respondent at the following address 919 east main street suite 1900 Richmond, Virginia 23219.